



RECORD OF TELEPHONE CONVERSATION

Date 7-9-85

Recorded by M Koerber

Talked with J Rickun, R Patterson of WDNR

Nature of call Incoming Outgoing

Route to	Information	Action
	R Calby	
	C Nash	
	G Comerford	
	R Patterson	

Main subject of call SO₂ in Wisconsin

Items discussed: ① DAMES + Moore Reports:

- a) CPI-Biron (Addendum No.2) - No comments on Items 1-4. I asked about support for exit temp for B004 w/ESP. DNR said that they had received some information from CPI.
- b) NE-Port Edwards (Add. No.2) - No comments on Items 1-2. Two additional issues to be answered: ambient air (i.e., public access to island) and reduced load parameters (identify, justify).
- c) NE-Kraft (Add. No.1) - No comments on Items 1-3. I asked about a reduced load analysis (to determine worst-case load) for the alternate inventory. I also asked about a complete, "clean" analysis reflecting ~~most~~ the final inventory. Ralph said that he was going to pull everything together in a TSD.
- d) Thilmany (Add. No.1) - Stack height increase needs to be supported by fluid modeling or site-specific data (monitored downwash violations or citizen's complaints). DNR asked about using mathematical modeling instead as support (they cited 2-3 dozen other cases of potential stack raisings in the State). I said that they final regulations only cite fluid modeling, monitored data, and citizen's complaints.

- Emission limits should be #/MMBTU. A #/hour limit must be supported by a reduced load analysis.
- Critical days should be based on both Thilmany's impacts and other source's impacts. We agreed that only Thilmany's impacts need be considered here, if it is understood that violations around other sources (to which Thilmany may have a "significant", but not major, impact) will be dealt with by DNR and all of the sources in the area.

(2) Stack Heights - Green Bay: Based on my cursory review, only P+G Fox River may be affected since the merging of the bark combustor with the boilers may have been done to receive ^{additional} dispersion credit. DNR noted that a case might be made for "sound economic and engineering reasons" since ~~the~~ merging is much cheaper than not merging (which would require a scrubber).

Madison: Oscar Meyer may be not affected if it is determined that the merging did not result in an increase in actual emissions.

Brokew: Since the proposed emission limits would restrict allowable emissions to less than 5000 T/yr, Wausau Papers is not affected (i.e., they can receive for merged stacks). I noted that a complex terrain modeling analysis is still needed.

Rhineland: DNR will send in this SIP for our processing.

③ State's 21 June 1985 Letter-

a) Alma - USEPA to take lead. We will draft letter to Dairyland Power concerning the need for a fluid modeling analysis to support stack height credit above formula height.

b) Attachment #2 sources - Delete Badger Ammu and Luther Hospital. DP Stoneman will be done separately or together with WPL Dewey. USEPA expressed concern about doing Milwaukee County - we will get back to them on this county. USEPA said that the remainder of the source areas were manageable - we will get back to them on beginning the analyses (e.g., inventory development). DNR asked that Appleton be done first.

c) Tracking Lists - Alternates: fix spacing under columns
Master: fix spacing (DNR noted that "source screened from further modeling" means "is the limit adequate")
Compliance Plans: many new plans have come in (either DNR will send in individual plans or their state compliance rule - to be finalized hopefully in August - for the statewide SIP).

d) PSD - I'll send my comments to Al Hubbard

e) TSD - DNR's proposal is fine.

f) PSD permits - DNR noted that limits in permits are still valid only if more restrictive than categorical limits.

④ Peshtigo - USEPA noted that there is no need to send in a SIP until 12 months after area is designated non attainment (designation is still pending in Headquarters). USEPA and DNR will notify their enforcement people and lawyers about the status of the SIP.